

Region 2 3201 Spurgin Road Missoula, MT 59804 May 22, 2018

Dear Interested Citizens:

Thank you for your thoughtful reviews and comments on a proposal by Montana Fish, Wildlife & Parks (FWP) to acquire fee title to approximately 276 acres from Randy Koch, as an addition to FWP's 35,041-acre Fish Creek Wildlife Management Area (FCWMA), located south of Tarkio in Mineral County. FWP's purpose for purchasing the land is to manage the important habitat (including 1.2 miles of riparian and fisheries habitat along Fish Creek) for deer, elk and other wildlife, and to prevent this habitat from potentially being developed or subdivided. Public access and recreational opportunities would be increased by managing the property as part of FCWMA.

Enclosed is a decision document in which FWP explains its rationale for recommending that the Fish & Wildlife Commission and the State Board of Land Commissioners approve this transaction as proposed. Upon completion of the public involvement process and by including information in this Decision Notice, FWP accepts the draft environmental assessment (EA) as final. The decision document also summarizes public comments on the proposed acquisition and explains how FWP considered and incorporated these comments in formulating a recommendation.

FWP will request approval for the purchase of the subject lands at the monthly Fish & Wildlife Commission meeting scheduled for June 14, 2018, in Helena. FWP will also request approval from the State Board of Land Commissioners, tentatively at its regularly scheduled meeting on June 18 in Helena. These meetings are open to the public, as are other regularly scheduled Commission and Land Board meetings.

Please feel free to contact me at 406-542-5500 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Randy Arnold Regional Supervisor

RA/sr

DECISION NOTICE

FWP Proposed Purchase of a 276-Acre Addition to the Fish Creek Wildlife Management Area

May 2018

DESCRIPTION OF PROPOSED ACTION

Montana Fish, Wildlife & Parks (FWP) proposes to acquire an approximately 276-acre addition to its Fish Creek Wildlife Management Area (FCWMA, located in Mineral County, SE of Superior), through a purchase from private landowner Randy Koch. The proposed acquisition property ("subject property") is composed of two private inholdings (parcels) within the 35,041-acre FCWMA, which is bordered by lands owned by the Montana Department of Natural Resources and Conservation (DNRC) and United States Forest Service (USFS). The 2 parcels are the approximately 116-acre Whitehorse parcel (just west of Whitehorse Gulch, off West Fork Fish Creek) and the 160-acre Main-Stem Fish Creek (main-stem) parcel.

This project represents a unique opportunity for FWP to conserve 2 private inholdings totaling 276 acres of vital wildlife and fish habitat in Fish Creek and to consolidate FWP ownership and management of the FCWMA. The property fills in a crucial gap in public ownership that connects wildlife movement across a broader landscape and protects key habitat for bull trout and westslope cutthroat trout. The Fish Creek drainage is a Tier 1 Terrestrial Focal Area in Montana's *Statewide Wildlife Action Plat* (SWAP; MFWP 2015¹) for wildlife connectivity and a high-priority linkage zone for carnivores (grizzly bear, Canada lynx, wolverine, etc.) between the Northern Continental Divide Ecosystem, the Ninemile Divide and the Selway-Bitterroot Wilderness. The Whitehorse parcel provides an important migratory corridor for elk and mule deer from the WMA to the higher elevation summer range in the proposed Great Burn Wilderness. The main-stem parcel is critical for north-south movement through the riparian habitat along Fish Creek; abundant white-tailed deer and moose, as well as mountain lion, black bear, gray wolf, mountain grouse, numerous migratory and resident birds, and amphibians are commonly found in this inholding.

Fish Creek is also a Tier 1 Aquatic Regional Focal Area, the most hydrologically intact tributary watershed in Mineral County, and the most valuable stronghold for westslope cutthroat trout and federally protected bull trout (both Montana Species of Concern, SOC²) in the middle Clark Fork region. This stream system supports the largest fluvial bull trout population in the middle Clark Fork River drainage and typically contains more redds than the rest of the tributaries in this region combined. The main-stem property includes a key migratory corridor and subadult-rearing area for migratory trout, as well as a high-value public fishery that currently supports > 4,000 angler-days annually.

The main-stem Fish Creek parcel proposed for acquisition contains approximately 78 acres of riparian habitat and more than 6,000 feet of the Fish Creek channel. Acquiring this inholding property would

¹ Montana Fish, Wildlife and Parks (MFWP). 2015. Montana's State Wildlife Action Plan. Helena MT. http://fwp.mt.gov/fishAndWildlife/conservationInAction/> Accessed 21 May 2018.

² A native animal breeding in Montana that is considered to be "at risk" due to declining population trends, threats to its habitats, and/or restricted distribution. The purpose of Montana's SOC listing is to highlight species in decline and encourage conservation efforts to reverse population declines and prevent the need for future listing as Threatened or Endangered Species under the Federal Endangered Species Act. More information may be found at http://mtnhp.org/animal/.

eliminate the risk of development that could compromise the ecological integrity of lower Fish Creek and this part of the WMA. Public ownership would also ensure additional access for public hunting, fishing and other opportunities along a popular recreational corridor.

FWP's acquisition of the Fish Creek WMA and State Park, winter road plowing on the nearby Fish Creek Road, and access to thousands of acres of adjacent public lands and the proposed Great Burn Wilderness make the subject property marketable for potential development and/or subdivision, which could directly impact conservation values on the WMA. A nearby property with similar attributes sold in 2013, on which a residential home/cabin and other developments have already been constructed. FWP made a large investment in the conservation of Fish Creek with the purchase of the WMA and State Park in 2010. Therefore, it is of high priority to the agency to protect this investment by acquiring inholdings that otherwise could be developed and affect FWP's ability to effectively manage the larger landscape for fish and wildlife values.

The potential replacement of native vegetation with houses, garages, barns, fences, driveways, and/or other construction would constitute a direct habitat loss for native wildlife populations on the subject property and would affect the integrity of managing the WMA as a whole. Human activity associated with residential areas, including pets and vehicle traffic, would displace many species from otherwise suitable habitat within an expanded radius beyond the house and development footprint. Conversely, the potential introduction of garbage, bird feeders, fruit trees and other non-native plants and foods would be expected to attract deer, bears and mountain lions into nuisance situations that would not occur without rural residential development; these situations are difficult and expensive to mitigate or correct. Additionally, potential and unencumbered private sale and/or development of the subject property would likely decrease future (public) hunting opportunities on those lands.

Acquisition of this property would be consistent with the goals of the Montana's SWAP (MFWP 2015) to conserve two community types of greatest conservation need: riparian/wetlands (a terrestrial community type) and mountain streams (an aquatic community type). Management of the property would be under the guidance of the Fish Creek WMA and Fish Creek State Park Interim Preliminary Management Plan (MFWP 2009³).

OBJECTIVES OF THE PROPOSED ACTION

FWP's objective for purchasing the land is to manage important habitat for deer, elk and other wildlife, and prevent this habitat from potentially being developed or subdivided. The primary benefits of acquiring this property would be to:

- 1. Protect an important forest and riparian corridor that provides vital habitat for wintering elk, mule deer, white-tailed deer, and moose;
- 2. protect a high-priority wildlife linkage zone;
- 3. protect some of the last and best remaining habitat for bull trout and westslope cutthroat trout in the middle Clark Fork region by securing 1.2 miles of riparian habitat along Fish Creek;

³ The Interim Management Plan can be found in the Draft EA (Appendix B) for the Fish Creek WMA and State Park acquisition on FWP's webpage at

http://fwp.mt.gov/news/publicNotices/environmentalAssessments/acquisitionsTradesAndLeases/pn_0081.html The Decision Notice (DN) is at http://fwp.mt.gov/news/publicNotices/decisionNotices/pn_0423.html and the revised DN is at http://fwp.mt.gov/news/publicNotices/decisionNotices/pn_0427.html All accessed 21 May 2018.

- 4. increase public access and recreational opportunities by managing the property as part of the FCWMA; and
- 5. maintain integrity of the WMA by preventing uses of these inholdings that would be incompatible with the WMA's habitat and recreation values.

ALTERNATIVES

Alternative A, No Action. Under the No Action alternative, FWP would not purchase the property from Randy Koch. The property would likely remain as private ownership into the future and could be developed or subdivided into numerous private parcels, based on its location and natural resource values and the history of sales of other inholdings along Fish Creek and its main tributaries since 2010. FWP's acquisition of the Fish Creek WMA and State Park, winter road plowing on the nearby Fish Creek Road, and access to thousands of acres of public lands and the proposed Great Burn Wilderness make the property very marketable. A nearby property with similar attributes sold in 2013, on which a residential home/cabin and other developments have been constructed.

Land management activities on similar inholdings within the WMA indicate that private ownership carries increased risk of further development or subdivision, riparian and channel encroachment, illegal water withdrawal, and general habitat degradation, as well as loss of public access. The subject property is in Mineral County and is not zoned.

Alternative B, Proposed Action. Under the Proposed Action alternative, FWP would purchase the 160-acre main-stem and 116-acre Whitehorse properties from Randy Koch as an addition to the FCWMA. Appraised value of the property is \$900,000. The properties are currently inholdings within the 35,041-acre FCWMA. If approved, the property would be added to and managed in concert with the WMA for the protection of important habitat for SOC, such as bull trout, and numerous game and nongame fish and wildlife species. Additionally, the proposed acquisition would also protect additional wetland and riparian areas that support important wildlife travel corridors. The addition of this inholding to the WMA allows FWP to protect its larger conservation investment in Fish Creek by keeping these parcels from being developed.

PUBLIC REVIEW PROCESS

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and make a decision based on this information. FWP released a draft environmental assessment ("Draft Environmental Assessment, Fish Creek Wildlife Management Area, Proposed Acquisition of Koch Inholdings") for public review of this proposal on March 14, 2018 and accepted public comment for 30 days until April 13, 2018.

Legal notices of the proposed addition and its Draft-EA availability were published twice each in the following newspapers (dates): *Independent Record* (Helena; March 13, 20), *Mineral Independent* (Plains; March 14, 21), and *Missoulian* (March 13, 20). A statewide news release was issued March 19.

FWP mailed 30 copies, and emailed approximately 39 notifications, of the Draft EA to adjacent landowners and interested individuals, groups and non-FWP agencies. The EA was available for public review and comment on FWP's web site (http://fwp.mt.gov/, "Public Notices") beginning March 14 through April 13, 2018.

A public hearing to explain the project, answer questions and take public comment was held in Alberton on March 22 (6:30 p.m.) at the Alberton Community Center.

Written Comments

FWP received 71 written or emailed comments (Appendix A):

- 58 from individuals (two of these comments each represented 2 people);
- 1 from a lumber production company: Idaho Forest Group;
- 1 from an agency: Montana Department of Natural Resources & Conservation; and
- 11 from organizations: Five Valleys Audubon, Five Valleys Land Trust, Great Burn Study Group, Hellgate Hunters & Anglers, Montana Chapter of Backcountry Hunters & Anglers, Montana Trout Unlimited, Montana Wildlife Federation, Ninemile Wildlife Workgroup, Shining Mountain Chapter of Montana Wilderness Association, Trout Unlimited, and WestSlope Chapter of Trout Unlimited.

Comments were from the following Montana towns and locations: 25 from Missoula; 7 from Alberton; 4 from Stevensville; 3 each from Superior, Bozeman, and Helena; 2 each from Trout Creek and Whitefish; and one each from Belgrade, Emigrant, Ennis, Gallatin Gateway, Glendive, Huson, Jefferson City, Lewistown, St. Regis, and Victor. Four comments were from out-of-state and 8 did not indicate a location. (Alternatively, 37 came from Region 2 FWP within 35 miles of FCWMA, 5 from further areas of Region 2 FWP, 17 from other FWP regions, 4 out-of-state, and 8 unknowns.)

There was extensive support for the proposed acquisition:

- 64 (90%) commenters (including individuals, the business, and all the organizations) supported the acquisition;
- 2 (3%) commenters (individuals) opposed the acquisition; and
- 5 (7%) commenters did not clearly indicate support or opposition.

Public Hearing Comments

Twenty-five members of the public attended the public hearing, and 12 provided public comments: 11 individuals and 1 organization (Hellgate Hunters & Anglers) (Appendix B). Nine (individuals and the organization) supported the proposed acquisition, 1 (individual) opposed the acquisition, and 1 was neutral.

The hearing provided a worthwhile and constructive forum for discussion during the question-and-answer (Q&A) portion of the meeting. (Attendees were reminded that comments they made during the Q&A portion were not counted in the official tally, and that there would be opportunity to make official comments during the public testimony portion of the hearing.)

Many recognized the property as having high value for wildlife, fish, and recreation. There was much interest in protecting this stretch of creek as a migratory corridor for native bull trout and westslope cutthroat trout. There were concerns about putting more land into public ownership in a county already largely dominated by public land. Alternatively, it was suggested that keeping the watershed healthy and open to the public will bring people in and be an economic opportunity to the county over the long-term.

Summary of All Comments

Including the written comments received and the public hearing⁴, FWP received a total 82 public comments, with 73 supporting and 3 opposing the proposal, and 6 not (clearly) stating support or opposition. Support represented 71 individuals (including 9 anonymous), in addition to 1 lumber production company and 11 organizations; opposition was from 3 individuals (1 anonymous).

Comments in support of FWP acquiring the Koch inholdings and integrating those lands into Fish Creek WMA included (in no particular order):

- Keeping the land from being developed or subdivided; keeping it in a more natural state
- Enhancing or protecting fish and wildlife populations and values, including habitat, riparian health, wildlife corridors, water quality
- Bringing the property in public ownership and use
- Personal and/or family traditions and memories associated with long-time recreational access to the Fish Creek area--going back to when most of the land was privately owned by Plum Creek Timber Company (or earlier), and was available for public recreation.
- Scenic and natural beauty
- General outdoor recreation and public access for hunting and fishing, as well as other forms of recreation such as hiking, camping, trail use
- Economic benefits to the surrounding community (FWP tax payments, tourism)
- Wise investment now; passing it on to future generations

RESPONSE TO PUBLIC COMMENT

Below is a summary of representative *public comments, questions and suggestions* and <u>FWP responses</u>. For ease of response, similar comments from different individuals may be grouped together if they expressed a similar view, and some comments are shortened or paraphrased. (Numbers in parentheses below correspond to the numbering of the individual commenters: those preceded by A are from Appendix A, and B are from Appendix B.)

Comment: The ownership of the NW1/4 Sec 34, T14N-R25 (adjacent to and SE of the Whitehorse parcel) is shown on the [Figure 1] map in the EA as being state trust land. This particular parcel was exchanged to the National Forest in December of 2010 in the Lolo Land Exchange (A-1).

FWP Response: Thank you for this correction. Yes, the NW4 of Section 34 in Figure 1 is incorrectly shown as "State of Montana" [Montana Department of Natural Resources and Conservation, DNRC] land, when in fact it is US Forest Service land. (The ownership of this NW4 section is correctly labeled in Figure 3.)

⁴ One organization speaking at the public hearing also submitted written comments; hence it was only counted once towards the total of 82. There could be some overlap between the 71 written and remaining 11 hearing commenters because: 5 of the hearing speakers did not identify themselves by name, 5 of the meeting attendees had submitted written comments, and 9 anonymous written commenters might or might not also be duplicating a named written commenter and/or hearing speaker.

Comment: Is this expanded real estate a part of the Fish Creek State Park (A-3a).

FWP Response: No; FWP's Fish Creek State Park (SP) is located along the north-central boundary of Fish Creek WMA, as depicted in Figure 1 in the EA. The WMA and SP currently are under the same Management Plan from FWP's original Fish Creek area acquisitions in 2010.

Comment: I also request FWP do the following to support access for the public:

- 1. Provide vehicle parking areas for fishers and hikers.
- 2. Provide public access to the Whitehorse track. That means no closed gates except during hunting season.
- 3. Provide public access to existing logging roads in the Whitehorse track for motorized and non motorized use (ATV, bikes, snowmobiles, hike, & horseback).
- 4. Provide public access to existing logging roads in the Fish Creek State Park. That means no closed gates. Open gates at Mile 7 of road 341 and roads off of Williams pass junction, and roads off 341 south of the pass.
- 5. Provide public access to existing logging roads to connect Williams pass and the Whitehorse track.

The overall intent is to provide public access to greatest number of Montanans and other visitors who are not able to hike 10 to 20 miles of mountains. (A-3b)

<u>FWP Response</u>: Thank you for your comments. We will consider how to improve parking along the main Fish Creek road adjacent to the Main Stem parcel.

These parcels will be managed under the Fish Creek WMA and Fish Creek State Park Interim Management Plan (see Footnote 3). Open and closed roads on the rest of the WMA and State Park, including a gated road on the WMA in the Whitehorse drainage, are outside the scope of this EA and Decision Notice. Travel plan on the WMA would be revisited during the development of a final management plan for Fish Creek WMA, along with opportunity for public input.

Comment: I'm in favor of FWP acquisition of the Koch property, subject to: . . . the Draft EA says the "forests on these parcels would be managed to support forest health . . . (EA, pg 14). Those words usually imply logging, which I would prefer not take place. (Nature has done a pretty good job over the millennia of keeping forests "healthy") (A-9.3).

<u>FWP Response</u>: Natural disturbances, such as fire and beetles, will continue to play a role in shaping the forests on the WMA over the long term. Any forest management actions proposed by FWP on the WMA such as prescribed fire, thinning, or commercial logging would be evaluated on the relative benefits to wildlife, as per the main purpose/goals of a Wildlife Management Area. Any proposed project would go through a public review process and have public comment opportunity.

Comment: The cabin on the property should be removed ASAP (A-9.4).

<u>FWP Response</u>: FWP's short-term plans are to leave the cabin on the property. The cabin, because of its structure and location, would be very difficult to move. Therefore, the other option would be to dismantle it. We will evaluate its benefit for administrative use and weigh this

against maintenance costs. If we are unable to find the cabin useful and it becomes difficult to maintain, then we will consider dismantling it at that time.

Comment: Sounds like a good thing, but you should ask the 454 people that where for the limited permit area for mule deer in HD 103 just in case seeing they are the majority of the Montana peopke, or maybe purchase it and make all animals in that area limited permit because making limited permit areas apparently give hunting opportunities not take opportunities away. FWP is curupt so it doesn't matter at the end. The letters that where submitted wanting names and email addresses could of been faked, check this email out (A-10).

<u>FWP Response</u>: This is beyond the scope of this proposed action. Mule deer buck harvest is currently managed with limited permits in HD 202. Decisions made in regards hunting seasons occur within FWP's separate, biennial season-setting process.

Comment: I oppose this land purchase. Taking more land out of private hands for the state to gain more control continues to deprive Montanans of their chance to own more than just small parcels in and around town and cities (A-27).

<u>FWP Response</u>: In 2010, FWP acquired 40,175 acres from The Nature Conservancy (TNC) to form the Fish Creek WMA (34,573 acres) and Fish Creek State Park (5,602 acres) (see Footnote 3). The Five Valleys Land Trust 148-acre addition to the WMA in early 2015, and the Rehbein addition in 2016 resulted in the WMA's current 35,041 acres. These properties were formerly owned by Plum Creek Timber Company (PCTC), as was the Main-Stem Koch property. These properties were sold to private buyers prior to TNC's acquisition of the PCTC lands in Fish Creek. Under PCTC ownership, the property had been open for public use. FWP purchased the Fish Creek WMA property for the long-term protection of fish and wildlife habitat and for the public to continue to be able to access and enjoy.

Comment: I support the acquisition of these parcels provided that recreational, hunting, and fishing access is maintained (A-41).

<u>FWP Response</u>: These parcels will be open to the public year-round for recreational use including hunting and fishing.

Comment: I am totally in favor of this land acquisition. I am 71 years old and have lived in Missoula my whole life and have seen where a simple act would have changed things in the future. This is one of those, usually it goes the other way and is ruined for the public. I do hope access will be restricted to non motorized (A-43).

1. **FWP Response**: Public recreation opportunities include: fishing, hunting, hiking, horseback riding, and other non-motorized recreation. Motorized vehicles must stay on designated roads. The only motorized access is via the main Fish Creek road which runs through the Main Stem property.

Comments: Weeds--

- 1. I also request FWP do the following to support access for the public. . . Provide weed control where it is the worst (A-3b.9).
- 2. I'm in favor of FWP acquisition subject to the following: . . . Use of chemical weed control either not be used or should be kept to an absolute minimum. Application by aircraft should be prohibited (EA, pg 14) (A-9.2).

3. I oppose because of the way you've managed the woods so far--leafy spurge at Tarkio and we asked them to spay the roadside for the spurge and FWP did not. Have not done a good job managing St. John's Wort where identified. Haven't been doing a good job with the land we've got (B-3).

FWP Response: Weed management is an important component of our overall habitat management program on the WMA. Weeds provide very little nutrition for native ungulates; therefore, it is important to reduce weed density and encourage growth of native bunchgrasses and shrubs that are important forage for mule deer, white-tailed deer, and elk. Weed spraying is conducted by vehicle and helicopter and not in riparian areas near creeks and tributaries. Vehicle spraying occurs primarily along roads. FWP believes the overall benefit of weed spraying outweighs the risk.

FWP uses a combination of chemical spraying and biological control (insects) to manage weeds on the WMA. FWP personnel and private contractors routinely spray open and closed roads and parking areas with the herbicide Milestone® at a rate of 6 ounces to the acre.

FWP personnel released 12,000+ *Aphthona spp* mix (a mix of flea beetle species) at 5 sites on leafy spurge in the Nemote Creek area in 2014. Two of the releases are along a common boundary with a neighbor to the southwest. Herbicide treatment to these areas in the past has been only somewhat successful.

Comment: These 2 acquisitions should never happen. Just another nail in the coffin to closing the whole Fish Creek area to the public. I see this as just another "Y to Y"/ Agenda 21 pursuit by an out of control MT Fish and Game. You are trying to build a wolf sanctuary --- needs to stopped now (A-51).

<u>FWP Response</u>: Fish Creek WMA and State Park are open to the public year-round except for a small portion of the WMA between Deer Creek and Wig Creek that is closed in the winter (Dec 1–May 15) to protect wintering wildlife. Wolf management in Fish Creek allows for a hunting season that runs from the first Saturday in September–March 15 and a trapping season from Dec 15–Feb 28. Five wolves can be harvested per person via any combination of hunting/trapping. Trapping on Fish Creek WMA is allowed by special permit and annual drawing in 7 trapping units, including a special allowance for trapping within the winter-closure area.

Comment: I don't oppose this particular purchase but am concerned about the future purchases. Stipulations come with Pittman-Robertson [Wildlife Restoration Act, 1937]. Nothing wrong with this project on its own--glad for the FWP property tax, but there's so much public land in Mineral County. [Only] 7% private land in Mineral County--granted FWP is paying vacant land taxes, but it's not the same as if the land is being developed. I'm not necessarily nixing this particular piece of land but looking at the big picture, we're opposed to purchasing any more public land. So, Mineral County has to be opposed (B-8, page 1).

<u>FWP Response</u>: FWP pays the same amount in county taxes as a private landowner. However, we do recognize that if the properties were to be developed, there would be opportunity for a higher tax rate to the county. Since the Main-Stem property is currently one legal "lot" and FWP plans no buildings, that presents a lost opportunity in this regard.

Comment: Talked about power [electric and utilities] and this is the last piece crossing the checkerboard to prevent modern day improvements up the drainage. This is the last nail in the coffin for future power. The horse is out of the barn now and this little purchase won't make a lot of difference, but people should be aware. Want people to think about the future big picture (B-8, page 2).

<u>FWP Response</u>: The Main-Stem property is the last undeveloped property up Fish Creek with a Northwestern Energy utility easement and power runs directly to the property. Any decisions to run power further up Fish Creek are complicated by encumbrances on WMA property purchased with federal (Pittman-Robertson) money that stipulates management decisions must benefit wildlife. This issue would remain, regardless of who would own the Koch properties. However, decisions regarding utility lines through the WMA are outside the scope of this process.

REGIONAL SUPERVISOR'S RECOMMENDATION ON FWP'S PURCHASE OF THE KOCH ADDITION TO THE FISH CREEK WMA

Based upon the Environmental Assessment (EA) and the applicable laws, regulations, and policies, FWP has determined that the proposed action will not have measurable negative effects on the human and physical environments associated with this project. Therefore, we conclude that the EA is the appropriate level of analysis and the preparation of an Environmental Impact Statement is unnecessary.

With the corrections and clarifications as noted in this Decision Notice, we adopt the Draft EA as final.

This proposal for FWP to purchase the 276-acre inholdings and add them to the Fish Creek WMA received overwhelming public support during the public review period. Supporters emphasized the benefits of protecting these important fish and wildlife habitats, as well as the public hunting, fishing, and recreational access that would accrue from the purchase. Therefore, I am pleased to recommend to the Fish and Wildlife Commission that it approve this proposal for FWP to complete this purchase and manage it as part of the Fish Creek WMA.

Randy Arnold

Region 2 Supervisor

Montana Fish, Wildlife & Parks

5/22/2018

Date